

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
RAS Citron, LLC 130 Clinton Road, Lobby, Suite 202 Fairfield, NJ 07004 (973) 575-0707 Attorneys for Secured Creditor Laura M. Egerman (LE-8250)	CASE NO.: 16-12747-JNP CHAPTER 13 HEARING DATE: December 19, 2017 JUDGE: Jerrold N. Poslusny, Jr.
In Re: ROBERT R. MADARA and DARLENE F. MADARA, Debtors.	

NOTICE OF MOTION FOR RELIEF FROM AUTOMATIC STAY

HEARING DATE AND TIME:
December 19, 2017 at 10:00 A.M.

**ORAL ARGUMENT IS REQUESTED IN THE EVENT
OPPOSITION IS TIMELY FILED**

TO:

Debtors- Robert R. Madara 314 E. Buckshutem Rd. Millville, NJ 08332 Darlene F. Madara 314 E. Buckshutem Rd Millville, NJ 08332	Debtors' Attorney- Seymour Wasserstrum Law Offices of Seymour Wasserstrum 205 West Landis Avenue Vineland, NJ 08360	Trustee Isabel C. Balboa Chapter 13 Standing Trustee Cherry Tree Corporate Center 535 Route 38 - Suite 580 Cherry Hill, NJ 08002
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PLEASE TAKE NOTICE that on December 19, 2017 at 10:00 A.M., or as soon thereafter as counsel may be heard, RAS Citron, LLC attorneys for Ditech Financial, LLC, the within creditor ("Creditor"), shall move before the Honorable Jerrold N. Poslusny, Jr. United

States Bankruptcy Judge, at Mitchell H. Cohen U.S. Courthouse 400 Cooper Street, 4th Floor Camden, N.J. 08101, Courtroom 4C, for an Order pursuant to 11 U.S.C. §362(d)(1) granting such Creditor relief from automatic stay or, for costs and disbursements of this action, and for such other and further relief as to the Court may seem just and proper.

PLEASE TAKE FURTHER NOTICE that in support of the Motion, the undersigned shall rely on the accompanying Certification in Support of Motion for Relief. A proposed form of Order is also being submitted. A Memorandum of Law has not been submitted because the issues raised by the Motion are not extraordinary or unusual necessitating the filing of legal briefs.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief requested in the Motion shall: (i) be in writing; (ii) specify with particularity the basis of the objection; and (iii) be filed with the **CLERK, UNITED STATES BANKRUPTCY COURT, U.S. POST OFFICE AND COURTHOUSE 401 MARKET STREET SECOND FLOOR CAMDEN, NJ 08101**, and simultaneously served on Secured Creditor's counsel, **RAS CITRON, LLC 130 CLINTON ROAD, LOBBY B, SUITE 202, FAIRFIELD, NJ 07004**, so as to be received no later than seven (7) days before the return date set forth herein.

PLEASE TAKE FURTHER NOTICE that unless objections are timely filed and served, the Motion shall be deemed uncontested in accordance with D.N.J. LBR 9013-1(a) and the relief requested may be granted without a hearing.

PLEASE TAKE FURTHER NOTICE that counsel hereby requests oral argument in accordance with D.N.J. LBR 9013-1 (f) in the event opposition papers are timely filed.

DATED: November 21, 2017

RAS Citron, LLC
Authorized Agent for Secured Creditor
130 Clinton Road, Lobby B, Suite 202
Fairfield, NJ 07004
Telephone: 973-575-0707
Facsimile: 973-404-8886

By: /s/Laura M. Egerman
Laura M. Egerman, Esquire
Email: legerman@rasnj.com